

Texte zu den geplanten neuen EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchs-kennzeichnung in der Beleuchtung – Zusammenstellung * des Umweltbundesamtes (UBA), Deutschland



Entwürfe der EU-Kommission vom 13. November 2017

Stellungnahme Bulgariens vom 26. Januar 2018

Hinweis: Bitte beachten Sie, daß der angehängte Text nur in Englisch verfaßt ist.

EN: Information on the coming EU Lighting Regulations – Ecodesign and Energy Labelling – Compilation * of the Federal Environment Agency (UBA), Germany

The EU Commission's drafts of 13 November 2017

Comments by Bulgaria, 26 January 2018

FR: Informations sur les futures réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation * de l'Agence Fédérale de l'Environnement (UBA), Allemagne

Les projets de la Commission Européenne du 13 novembre 2017

Commentaires de la Bulgarie du 26 janvier 2018

Indication: Veuillez noter que le présent texte n'est disponible qu'en anglais.

* <http://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

Inhaltsverzeichnis und Übersicht darüber, welche Themen der folgende Text behandelt und welche nicht

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FR: Table des matières et un aperçu de quels thèmes sont traitées dans le texte ou ne sont pas

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Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

Bulgarian Comments on draft ecodesign and energy labelling regulations for light sources

Bulgaria appreciates the work done by the Commission in improving requirements for light sources. However, we would like to make several comments following the Consultation Forum held on 7 December 2017 regarding the Commission's proposals of ecodesign and energy labelling measures for light sources.

Subject matter and scope

Bulgaria believes that light sources placed on the market in a containing product already regulated by ecodesign and energy labelling regulation should be exempted from both proposals on ecodesign and energy labelling.

Actually, the regulations for the containing product provide for its energy efficiency and any further regulation of components will not bring to any additional energy saving, but an unnecessary burden will be placed on manufacturers. We think this burden should be avoided. Besides, the compliance with two different regulations will confuse consumers, market surveillance authorities, traders and manufacturers. Another source of confusion will be a requirement of having two energy labels with a containing product already regulated by energy labelling regulation. We consider that double labelling should be avoided.

Additionally, this double regulation will impose an obligation for manufacturers of such product to check every time whether the light sources incorporated in their products are uploaded in the product database or not. This obligation will be confusing and will create unnecessary burden for manufacturers especially in case the light sources are not uploaded.

Moreover, the scope of exclusion of the energy labelling regulation is not in line with the scope of exclusion of the ecodesign regulation. The ecodesign scope excludes lamps used in ambient temperatures below -30°C and above 120°C. Bulgaria proposes using the scope of the ecodesign regulation for both documents.

We also believe that spare parts should be exempted from the scope of these regulations. We support application of the repair as produced principle.

Annex III of draft Energy Labelling act: Label for light sources

The QR-code provides fast access for consumers to the website optimized for mobile devices with additional information on the light source. Obviously, data will be shown only if the product is registered in the database. In this regard we consider the Commission should foresee a procedure in case of identified missing records in the product database linked to the QR-code on the label.

Article 4 of draft Ecodesign act: Removal of light sources and separate control gears

We believe that possibility to readily remove light sources and separate control gears for end-users and qualified professionals is questionable. Especially when it is about products with a shorter lifetime than the light source or separate control gear. This requirement does not bring any value added but could conflict with requirements for material efficiency, freedom of manufactures to design, increase in costs and certain consumer preferences for a slim design, etc.